

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF NORTH CAROLINA  
RALEIGH DIVISION**

In re: )  
 ) Case No. 15-00081-5-SWH  
Advanced Lighting Technologies, LLC, ) Chapter 11  
 )  
Debtor )  
 )

**EMERGENCY MOTION FOR ORDER ALLOWING USE OF CASH COLLATERAL**

NOW COMES Advanced Lighting Technologies, LLC (the "Debtor" or "ALT"), and moves for an Order allowing the use of cash collateral pursuant to 11 U.S.C. §363 and Rule 4001 of the Federal Rules of Bankruptcy Procedure and in support thereof would respectfully show the Court the following:

1. On January 6, 2015, ALT Services Group filed a voluntary petition for relief pursuant to Chapter 11, Title 11 of the United States Code (the "Bankruptcy Code") in the Eastern District of North Carolina.
2. This motion is filed simultaneously with the petition. The Debtor expects the Bankruptcy Court for the Eastern District of North Carolina to issue an order pursuant to 11 U.S.C. §§ 1107 and 1108 of the Bankruptcy Code, authorizing the Debtor to retain its assets and operate its business as debtor in possession.
3. This Court has jurisdiction to consider this motion pursuant to 28 U.S.C. §§ 157 and 1334. This is a core proceeding within the meaning of 28 U.S.C. § 157 (b)(2)(M).
4. The Debtor is in the business of providing electrical construction services, primarily to industrial and commercial customers. The Debtor's primary assets are the profits generated from the goods and services provided to its customers.
5. The Debtor executed a promissory note for the benefit of BB&T on or about August 19, 2013 (the "Note") and granted a security interest to BB&T in, among other things, all inventory, accounts and equipment.
6. Since the Debtor is an electrical construction company, certain debts owed to its suppliers may be subject to those supplier's lien rights under N.C. Gen. Stat. 44A.

7. The Debtor estimates that the amount due to BB&T as of the Filing Date subject to the lien on cash collateral is \$448,291.88.
8. The Debtor is profitable in its operations and has positive cash flow overall from its operations. As of the Petition Date, the Debtor has approximately in outstanding receivables that it believes are good and collectible.
9. The purposes of the bankruptcy filing is to allow for the Debtor to restructure its debts and expenses, as to be more particularly described and addressed in the Debtor's plan of reorganization.
10. The funds payable to the Debtor with respect to the above-referenced accounts receivable may be alleged by BB&T to constitute "cash collateral" within the meaning of 11 U.S.C. §363.
11. The Debtor is in need of funds to fund its operations. The Debtor does not have any available source of funds to maintain ongoing operations while it reorganizes.
12. The Debtor pays its ordinary and necessary expenses, including payroll, on a weekly basis.
13. In order to continue the operation of its business, the Debtor requires the use of cash collateral on an emergency, interim basis pending a final hearing on such use of cash collateral.
14. The Debtor proposes to grant lien claimants a replacement lien in post-petition accounts receivable up to the value of the receivables existing at the time of filing. In addition, the Debtor proposes to make regular monthly cash payments to BB&T in the amount of \$2,500.00 per month, beginning on January 31, 2015.
15. The Debtor will present a projection of the Debtor's cash flow needs for the 30 day period at the hearing on this Motion or prior to the hearing on request of a party once the same has been completed.

WHEREFORE, the Debtor prays for an order of the Court (i) allowing the interim use of cash collateral pending final order; and (ii) setting a final hearing to consider the use of cash collateral.

This 7th day of January, 2015.

JORDAN PRICE WALL GRAY JONES & CARLTON, PLLC

By: /s/Philip W. Paine  
Philip W. Paine  
NC State Bar No. 31710  
Attorneys for Debtor  
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	)	
Advanced Lighting Technologies, LLC,	)	Chapter 11
	)	
Debtor	)	

**NOTICE OF MOTION AND NOTICE OF HEARING**

NOTICE IS HEREBY GIVEN that a hearing is said cause will be held:

DATE: January 14, 2015  
TIME: 11:00 a.m.  
PLACE: United States Bankruptcy Court,  
2 Princess St.  
Wilmington, NC 28401

to consider and act on the following matters:

The Debtors filed a motion with the Court requesting an order, (i) allowing the interim use of cash collateral pending final order; and (ii) setting a final hearing to consider the use of cash collateral.

Notice is hereby given that the Motion may be allowed provided no response and request for a hearing is made by the parties in interest in writing to the Clerk

Dated: January 7, 2015

JORDAN PRICE WALL GRAY JONES & CARLTON, PLLC

By: /s/Philip W. Paine  
Philip W. Paine  
NC State Bar No. 31710  
Attorneys for Debtor  
Post Office Box 12347  
Raleigh, NC 27605-2347  
Telephone: (919) 821-7700  
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**CERTIFICATE OF SERVICE**

The undersigned hereby certifies under penalty of perjury that she is over eighteen (18) years of age and **EMERGENCY MOTION FOR ORDER ALLOWING USE OF CASH COLLATERAL** and **NOTICE OF MOTION AND HEARING** was this day served upon the below named person(s), parties and/or counsel by mailing, postage prepaid, first class mail, a copy of such instrument to such persons, parties and/or counsel at the address shown or as indicated below:

Marjorie K. Lynch  
Bankruptcy Administrator  
Eastern District of North Carolina  
434 Fayetteville Street  
Suite 640  
Raleigh, NC 27601

See attached matrix

Date: January 7, 2015

/s/Philip W. Paine  
Philip W. Paine  
Jordan Price Wall Gray Jones & Carlton, PLLC

EMPLOYMENT SECURITY COMMISSION PO BOX 26504 RALEIGH, NC 27611	INTERNAL REVENUE SERVICE CENTRALIZED INSOLVENCY OPERATIONS PO BOX 7346 PHILADELPHIA PA 19101	NC DEPARTMENT OF REVENUE OFFICE SERVICES DIV., BANKRUPTCY UNIT PO BOX 1168 RALEIGH, NC 27602
US ATTORNEY 310 NEW BERN AVENUE, SUITE 800 FEDERAL BUILDING RALEIGH, NC 27601	U. S. BANKRUPTCY COURT ROOM 209, 300 FAYETTEVILLE STREET P.O. DRAWER 1441 RALEIGH, NC 27602	AHERN RENTALS P. O. BOX 271390 LAS VEGAS, NV 89127
BB AND T PO BOX 1847 WILSON NC 27894	BB&T CREDIT CARDS 632 DABNEY DRIVE HENDERSON, NC 27536	BCBS OF NC P. O. BOX 580017 CHARLOTTE, NC 28258
C.E.S. (CITY ELECTRIC ACCOUNTS-RAL) P. O. BOX 16707 GREENSBORO, NC 27416	CED P. O. BOX 1510 CARY, NC 27512-1510	CAROLINA OFFICE SYSTEMS 12345 REESE BLVD. WEST SUITE #130 HUNTERSVILLE, NC 28078
CITY OF HENDERSON P. O. BOX 1434 HENDERSON, NC 27536	CRYSTAL SPRINGS P. O. BOX 660579 DALLAS, TX 75266-0579	DENTAL BLUE SELECT ATTN: BILLING DEPARTMENT P. O. BOX 2400 WINSTON SALEM, NC 27102
ECK SUPPLY COMPANY P. O. BOX 890250 CHARLOTTE, NC 28289	ELECTRIC SUPPLY & EQUIPMENT COMPANY P. O. BOX 601118 CHARLOTTE, NC 28260	EXPRESS EMPLOYMENT PROFESSIONALS P. O. BOX 535434 ATLANTA, GA 30353
FASTENAL P. O. BOX 978 WINONA, MN 55987	FRED'S TOWING & TRANSPORT, INC. 400 INDUSTRY DRIVE HENDERSON, NC 27537	GRAINGER DEPT. 873408165 PALATINE, IL 60038
GREGORY POOLE P. O. BOX 60457 CHARLOTTE, NC 28260	HILTI INC PO BOX 382002 PITTSBURGH, PA 15250	INSERV CORPORATION 121 DICKENS ROAD FUQUAY VARINA, NC 27526

JAMES S. LIVERMON, III POYNER SPRUILL PO BOX 353 ROCKY MOUNT, NC 27802	MOBILE MINI, INC. P. O. BOX 740773 CINCINNATI, OH 45274	MOVEABLE CUBICLE 6404 FALLS OF NEUSE ROAD SUITE 200 RALEIGH, NC 27615
O'REILLY AUTO P. O. BOX 9464 SPRINGFIELD, MO 65801	ROBERT CAMPBELL 7 ECTOR STREET, APT D ASHEVILLE, NC 28806	TERMINIX P. O. BOX 2587 FAYETTEVILLE, NC 28302
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